



September 22, 2015

Forest Supervisor Kohrman
Cibola National Forest & National Grasslands
2113 Osuna Rd. NE
Albuquerque, NM 87113

Via email: ekohrman@fs.fed.us
cibolamtnsplanrevision@fs.fed.us

RE: Access Fund Comments on Cibola National Forest Mountain Ranger Districts Plan Revision - Inventory and Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System

Dear Supervisor Kohrman,

The Access Fund appreciates this opportunity to comment on the Cibola National Forest Phase 2 of the *Inventory and Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System* (Inventory).

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 10,000 members and 80 affiliates. We currently hold [memorandums of understanding](#) with the Bureau of Land Management, National Park Service, and Forest Service to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach.

For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

Phase 1 of a USDA Forest Service wilderness inventory does not consider developed recreation resources, but Phase 2 seeks to identify areas that include “substantially noticeable” characteristics that are fundamentally incompatible with wilderness designation. These “substantially noticeable” areas are considered for exclusion from the inventory in order to prevent undesirable future management issues and degradation of wilderness values.

Magdalena RD Wilderness Inventory IDs D3_5K11 and D3_5K13 include areas that should be considered “substantially noticeable” because they include developed, longstanding and well-used climbing resources (see Map 1 and Map 2). The climbing areas should be considered as “Other improvements which create deviations in form, line, color, texture and pattern in the surrounding natural landscape.”¹ As a general rule, “developed [recreation] sites should not be included” in the wilderness inventory.² The reason why the aforementioned developed climbing areas should be considered “substantially noticeable” is that the climbing routes are dependent on fixed anchors, or bolts (permanent fixtures in the rock that are ~3/8” diameter and ~3” long), to provide climbers with a modicum of safety.

Climbing is considered an appropriate wilderness activity³; however, not all types of climbing activities are suitable within wilderness areas. Bolt dependent climbing (face climbing that relies on many fixed, permanent anchors) within designated wilderness can be problematic with regard to wilderness management.⁴ Bolted climbs also necessitate long-term maintenance.⁵ Bolts need to be replaced every 10 – 15 years, and handheld, motorized drills are the best tool for safely maintaining bolts at a bolt-intensive climbing area. Motorized drills are specifically prohibited in designated wilderness. Therefore, existing bolted climbing resources, which may not subscribe to wilderness standards, tend to create a variety of undesirable management issues if included within recommended wilderness areas.

Access Fund recommends that the existing, developed climbing areas displayed in Map1 be excluded from the wilderness inventory. The D3_5K11 wilderness inventory boundary could be shifted to the east 500 meters from the road to accommodate the bolt-dependent climbing area known as Enchanted Tower. The D3_5K13 wilderness inventory boundary would need a more

¹ DRAFT Cibola National Forest Mountain Ranger Districts Plan Revision - Inventory and Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System, Page 18, July 21, 2015

² FSH 1909.12 Chapter 70, 71.22b #7

³ National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012 state that climbing is an appropriate wilderness activity. The USDA National Forest Service has yet to issue a national policy on wilderness climbing; however, climbing is allowed in most every national forest with climbing resources. There are approximately 7,000 climbing areas in national forest wilderness (source mountainproject.com).

⁴ National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012

⁵ <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

substantial adjustment to exclude the developed, bolt-dependent climbing area; however, the resultant area would still be significantly larger than 5,000 acres. These recommended wilderness inventory boundary adjustments would allow for established and developed climbing activities, support the integrity of wilderness character, and prevent undesirable future wilderness management issues.

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Access Fund supports wilderness designation when appropriate, and appreciates the consideration of our recommendations on the Phase 2 Wilderness Inventory results. Access Fund has the experience, local contacts, and resources to help Cibola NF collaborate with local climbers to improve and steward the climbing environment. Please keep us informed as the planning process proceeds.

Feel free to contact me via telephone (720-588-3512) or email (erik@accessfund.org) to discuss this matter further.

Best Regards,

A handwritten signature in black ink that reads "Erik Murdock". The signature is written in a cursive, flowing style.

Erik Murdock, PhD
Policy Director
Access Fund

cc: Brady Robinson, Access Fund, Executive Director
Ty Tyler, Access Fund, Stewardship Director
Bryan Pletta, New Mexico Climbers Resource and Advocacy Group

Map 1



